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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

AZIZ CEYLAN, JOSEPH CEYLAN, and B &
S INTERNATIONAL TRADING INC. (d/b/a
B&B JEWELRY).

Plaintiffs,

v.

MEER ENTERPRISES LLC,
Defendant.

Civil Action No.: 2:18-cv-11546

Hon. Katharine S. Hayden, U.S.D.J.
Hon. Cathy L. Waldor, U.S.M.J.

Document Filed Electronically

**DECLARATION OF
DONALD W. KIEL IN SUPPORT OF
ADMISSION PRO HAC VICE OF
DOUGLAS R. HIRSCH, ESQ. AND
JENNIFER ROSSAN, ESQ.**

I, **DONALD W. KIEL** an attorney duly admitted to practice law in the Courts of the State of New Jersey and the United States District Court for the District of New Jersey, declare pursuant to Local Civil Rule 101.1(c) as follows:

1. I am a partner with the law firm of K&L Gates LLP, attorneys for the Defendant Meer Enterprises LLC (“Defendant”).

2. I submit this Declaration in support of Defendant’s application for an Order admitting Douglas R. Hirsch, Esq. and Jennifer Rossan, Esq., as counsel *pro hac vice* in the within matter pursuant to Local Civil Rule 101.1(c).

3. I am personally familiar with the facts set forth in this Declaration.

4. Attorney Hirsch's accompanying declaration sets forth his qualifications and demonstrates that he is a member in good standing of the Bars of the State of New York and the United States District Courts for the Southern and Eastern Districts of New York, and the United States Court of Appeals for the First, Second, and D.C. Circuits.

5. Attorney Rossan's accompanying declaration sets forth her qualifications and demonstrates that she is a member in good standing of the Bars of the Commonwealth of Massachusetts and the State of New York and the United States District Court for the Southern and Eastern Districts of New York.

6. Counsel for the Plaintiffs advised me that they consent to the relief sought by Defendant pursuant to this application.

7. Attorneys Hirsch and Rossan understand that only counsel of record and an attorney admitted to practice before this Court may file papers, enter appearances for parties, sign stipulations, or sign and receive payments on judgments, decrees or orders and must accept service of all papers served.

8. Attorneys Hirsch and Rossan understand their obligations to make an annual payment to the New Jersey Lawyers' Fund for Client Protection, to make a one-time payment of \$150.00 to the Clerk of the United States District Court for the District of New Jersey, to strictly adhere to the dates fixed for all proceedings in this action and to be bound by the Local Civil Rules, in particular the rules relating to Judicial Ethics and Professional Responsibility and Discipline of attorneys.

9. If the Court grants this request for *pro hac vice* admission, either I or another attorney associated with K&L Gates LLP that is admitted to practice before this Court will continue to serve as local counsel of record in this matter, will review and sign all pleadings,

briefs, and other papers filed with the Court, will be responsible for the conduct of this action and for the conduct of the attorney admitted *pro hac vice*, and will otherwise comply with all the terms and conditions of Local Civil Rule 101.1(c).

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: Newark, New Jersey By: /s/ Donald W. Kiel
September 7, 2018 Donald W. Kiel